

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

NENAD M. KOSTIC,	§	
Plaintiff,	§	
	§	No. 3:10-cv-2265-M
v.	§	
	§	
TEXAS A&M UNIVERSITY AT	§	
COMMERCE,	§	
Defendant.	§	

**PLAINTIFF'S SUPPLEMENTAL MOTION,  
AND INCORPORATED MEMORANDUM,  
FOR REASONABLE ATTORNEYS' FEES AND COSTS**

Nenad M. Kostić, who has previously moved for fees and costs (Doc. 265), hereby supplements his motion to account for fees incurred since the filing of that previous motion on September 17, 2015, to make adjustments to the hours as detailed in footnotes 2 and 7 in his reply in support of the motion, to account for costs invoiced since the filing of the previous motion, and to include one cost item inadvertently omitted from the previous motion. Supporting this supplemental motion are the declarations of Brian P. Sanford and Robert E. McKnight, Jr. (Exhs. 1 & 2, at P. Supp. Appx. 1 and P. Supp. Appx. 11), attesting to the accuracy of the time entries and the reasonable necessity of performing the claimed work for the proper prosecution of this matter, as well as the accuracy and reasonable necessity of the costs.

With these adjustments, the amounts that the Court should award are set forth below:

a. An adjusted lodestar fee of \$542,181.25, based on the following:

<b>Lawyer</b>	<b>Hours</b>	<b>Rate</b>	<b>Fee</b>
Brian P. Sanford	637.28 <sup>1</sup> 10.00 <sup>2</sup>	\$650	\$414,232.00 \$6,500.00
David B. Norris	395.525 <sup>3</sup> 0.20 <sup>2</sup>	\$250	\$98,881.25 \$50.00
David B. Norris (Law Clerk)	11.025	\$100	\$1,102.50
Ashley E. Tremain	19.44	\$225	\$4,374.00
Amy E. Gibson	1.60	\$450	\$720.00
Barry S. Hersh	5.80	\$450	\$2,610.00
Robert E. McKnight, Jr.	14.30 13.40 <sup>2</sup>	\$495	\$7,078.50 \$6,633.00
<b>Total</b>			\$542,181.25

b. Costs (including those in the bill of costs) in the amount of \$61,995.18 (as requested in the original motion), plus \$556.75 for costs added since the original motion, for a total of \$62,551.93.

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<sup>1</sup> 638.28 hours (requested in the original motion), less reduction of 1.00 hour (as described in footnotes 2 and 7 of the reply memorandum).

<sup>2</sup> New time accrued since the original motion.

<sup>3</sup> 398.025 (requested in the original motion), less reduction of 2.50 hours (as described in footnote 7 of the reply memorandum).

- c. Postjudgment interest on \$604,733.18 from August 13, 2015.

Respectfully submitted,

/s/ Brian P. Sanford

Brian P. Sanford  
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David B. Norris  
Texas Bar No. 24060934

**THE SANFORD FIRM**

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**ATTORNEYS FOR PLAINTIFF  
NENAD KOSTIĆ**

**CERTIFICATE OF SERVICE**

On November 16, 2015, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all counsel of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Brian P. Sanford

Brian P. Sanford